

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BMW of North America, LLC et al.

Plaintiff(s),

vs.

Quality Star Benz LLC

Defendant(s).

Case #2:12-cv-00889-GMN -VCF

CORRECTED

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

NUNC PRO TUNC

John G. Froemming, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Jones Day

(firm name)

with offices at 51 Louisiana Avenue, NW,
(street address)

Washington,

(city)

District of Columbia,

(state)

20001,

(zip code)

(202) 879-3939,

(area code + telephone number)

jfroemming@jonesday.com

(Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

BMW of North America, LLC and BMW AG to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

3. That since January 15, 1988, Petitioner has been and presently is a
 (date)
 member in good standing of the bar of the highest Court of the State of District of Columbia
 (state)
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
 possession of the United States in which the applicant has been admitted to practice law certifying
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
 of other States on the dates indicated for each, and that Petitioner is presently a member in good
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
SEE ATTACHED		

5. That there are or have been no disciplinary proceedings instituted against petitioner,
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

Not applicable.

4. Court Admissions for John G. Froemming

<u>Court</u>	<u>Date Admitted</u>	<u>Bar Number</u>
Supreme Court of Virginia	October 9, 1985	25319
D.C. Court of Appeals	January 15, 1988	412564
U.S. District Court for the Eastern District of Virginia	February 10, 1989	
U.S. District Court for the District of Columbia	November 4, 1991	
U.S. District Court for the District of Maryland	November 6, 1995	12509
U.S. District Court for the District of Colorado	January 14, 2002	
U.S. Court of Appeals for the District of Columbia	October 2, 1991	
U.S. Court of Appeals for the Ninth Circuit	January 5, 2007	
U.S. Court of Appeals for the Fifth Circuit	November 4, 2011	

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

Not applicable.

7. That Petitioner is a member of good standing in the following Bar Associations:

American Bar Association

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 10-2 during the past three (3) years in the following matters:

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
No.			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF District of Columbia
COUNTY OF _____ }

[Signature]
Petitioner's signature

John G. Froemming, Petitioner, being first duly sworn, deposes and says:
That the foregoing statements are true.

[Signature]
Petitioner's signature

Subscribed and sworn to before me this

9th day of July, 2012.
Monette E. Thompson, Notary
Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Andrew P. Gordon,
(name of local counsel)
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

McDonald Carano Wilson LLP 2300 West Sahara Avenue, Suite 1000,
(street address)
Las Vegas, Nevada, 89102,
(city) (state) (zip code)
(702) 873-4100, agordon@mcdonalddcarano.com.
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Andrew P. Gordon as
8 his/her/their Designated Resident Nevada Counsel in this case.
(name of local counsel)

9
10 (Aimee Gessner, BMW AG) A. Gessner
11 (Party signature)

12 (Party signature)

13 (Party signature)

14
15 **CONSENT OF DESIGNEE**

16
17 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

18
19 Pat Lundvall, for
20 Designated Resident Nevada Counsel's signature

21
22 Bar number 3421

Email address

agordon@mcdonaldnavarro.com

23 **APPROVED** this 31st day of May, 2013.

24 **NUNC PRO TUNC DATE: July 9, 2012.**

25
26 Gloria M. Navarro
27
28 United States District Judge

Rev. 12/11



District of Columbia Court of Appeals
Committee on Admissions
430 E Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN G. FROEMMING

was on the 15TH *day of* JANUARY, 1988

duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 5, 2012.

JULIO A. CASTILLO
Clerk of the Court

By: Brandie Hancock
Deputy Clerk

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,
do hereby certify that

JOHN GILBERT FROEMMING

was admitted to practice as an attorney and counsellor at the bar of this Court on
October 9, 1985.

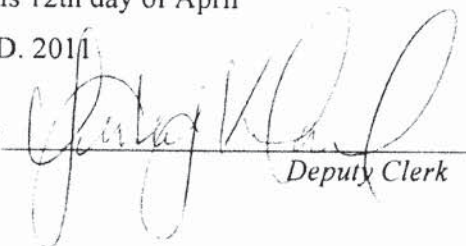
I further certify that so far as the records of this office are
concerned, JOHN GILBERT FROEMMING is a member of the bar of this
Court in good standing.

Witness my hand and seal of said Court

This 12th day of April

A.D. 2011

By:



Patricia L. Harrington
Deputy Clerk